

South Shore Tri-Town Development Corporation

223 Shea Memorial Drive, South Weymouth, MA 02190

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09 April 01

Mark Krivansky, RPM
Department of The Navy
Northern Division, Code 1823
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19130-2090

Re: **Comments - Draft Final Phase II Remedial Investigation Report
Sewage Treatment Plant, Operational Unit 07, IR Program Site 7**

Dear Mr. Krivansky,

This letter includes comments on the Draft Final Phase II Remedial Investigation, Sewage Treatment Plant (STP), South Weymouth Naval Air Station Comprehensive Long-Term Environmental Action (CLEAN) Contract, submitted to: Northern Division, Environmental Branch, Code 18, Naval Facilities Engineering Command, 10 Industrial Highway, Mail Stop No. 82, Lester, PA 19113-2090, submitted by Tetra Tech NUS Inc., 600 Clark Avenue, Suite 3, King of Prussia, PA 19406-1433, Contract No. N62472-90-D-1298, Contract Task Order 0310, March 2001.

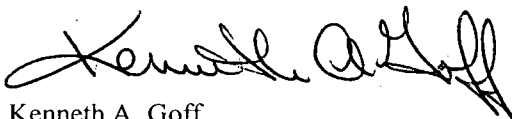
The site is located within the area of the former South Weymouth Naval Air Station that is currently planned to be redeveloped during SSTTDC's first stage of redevelopment. This first stage of redevelopment ("The Initial Build") is scheduled to begin in 2003.

We look forward to an updated site management plan that contains a reprioritization for the CERCLA site closures – focusing on the northwest quadrant of the base and then on those sites south of this area along the western portion of the base.

I have enclosed comments by SSTTDC consultant Jim Kinch. If you have any questions regarding the attached comments, please contact me.

Thank you for the opportunity to review this Draft Final Phase II Remedial Investigation Report.

Sincerely,



Kenneth A. Goff
Executive Director

Encl.: Draft Final RI Phase II Comments, Sewage Treatment Plant, JK, April 6, 2001

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MEMORANDUM

To: Ken Goff, Executive Director SSTTDC

From: Jim Kinch

Date: April 9, 2001

Subject: Sewage Treatment Plant – Draft Final Phase II RI Comments

A Draft Final Phase II Remedial Investigation Report (RI) on the Sewage Treatment Plant (STP) at the former South Weymouth Naval Air Station was prepared by ENSR on behalf of Tetra Tech NUS, Inc. for the Northern Division Naval Facilities Engineering Command under Contract No. N62472-90-D-1298 and Task Order No. 0310. The Draft Phase II RI was submitted in March 2001 and summarizes previous Phase I site work and recent Phase II site work. Also presented in this RI are a human health risk assessment and an ecological risk assessment.

General Comments:

1. Depending on the requirements proposed for the site – does an S-1 exceedence promote some kind of use restriction on the STP site? Conclusions in this report suggest that this would be so.
2. Sampling under the steel canopy over the sludge area – is this a significant oversight? Where is this relative to the tile area or the drainage ditches?
3. Based on my review the transmissivity between the two strata appear roughly equivalent, but what does this mean anyway? Given the low concentrations of all materials in the lower strata (with possible exception of the PAHs, and they are poorly soluble anyway) the potential for raising impact questions on that basis is very low.

The Navy noted clarification of the transmissivity data would be included in the final RI - the data appear equivocal and do not support conclusion of reduced conductivity in the lower strata, there did not appear to be any greater input to clarify statements.

4. Pest/PCB tests suggest the highest concentrations are in the drainage ditch – should we recommend that the FS focus on actions to minimize the exposure potential here or wait for the FS?

Specific Comments:

1. Section 4.4, page 4-6: The June 2000 soil samples for PCBs need to be noted. An explanation for the additional testing and explanation of the data should be presented here.
2. Tables 4-7 and 4-8: Are we to assume that only one SVOC compound was detected with a 'J' value in all groundwater samples? And only 4 SVOCs were detected in all surface waters

collected? What were the actual detection limits for the water method runs? MDL of 10 or 0.5? The data presentation appears to be inconsistent.

3. Table 4.13: The detection limits of 0.003 ug/l and lower appear unrealistic based on current technology. It is difficult to believe that any data points < 0.01 ug/l are within the technical detection limit of the instrumentation and are insignificant scientifically in any case.